1 2 3 4 5 6 7 8	Leslie Bryan Hart, Esq. (SBN 4932) Brandi M. Planet, Esq. (SBN 11710) FENNEMORE CRAIG, P.C. 300 E. Second St., Suite 1510 Reno, Nevada 89501 Tel: 775-788-2228 Ihart@fclaw.com; bplanet@fclaw.com (Pro Hac Vice Petition to be submitted) George E. Kostel, Esq. Impresa Legal Group 3033 Wilson Blvd., Suite 700 Arlington, Virginia 22201 Tel: 703-842-0660 georgekostel@impresalegal.com		
9	Attorneys for Defendant Renato Libric		
10	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
11	MOOSE RUN, LLC,	CASE NO.: 2:18-cv-00425-GMN-NJK	
12	Plaintiff,	STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR	
13	vs.	DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO THE FIRST	
15	RENATO LIBRIC, individually; and DOES 1-10,	AMENDED COMPLAINT (FIRST REQUEST)	
16	Defendants.	, , , , , , , , , , , , , , , , , , ,	
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18	Plaintiff Moose Run, LLC, and Defendant Renato Libric, by and through their		
19	undersigned counsel, hereby agree and stipulate that the deadline by which Defendant must answer or otherwise respond to the Amended Complaint filed on May 4, 2018 (ECF No. 14) is extended from May 18, 2018 to June 1, 2018.		
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22	This extension is appropriate to allow Defendant's counsel additional time to prepare a		
23	response to the Amended Complaint, which was filed in response to Defendant's Motion to		
24	Dismiss Complaint filed on April 14, 2018 (ECF No. 9). The Amended Complaint alleges new		
25	facts, as well as a new cause of action, which require consultation with Defendant prior to the		
26	filing of a further responsive pleading. This is the parties' first request for an extension of time		
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28	///		
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1	to respond to the Amended Complaint and is not intended to cause any undue delay or prejudice		
2	to any party.		
3	DATED: May 17, 2018.		
4	FENNEMORE CRAIG, P.C.	KEMP, JONES & COULTHARD, LLP	
5	By: <u>/s/ Leslie Bryan Hart</u> Leslie Bryan Hart, Esq. (SBN 4932)	By: /s/ Michael J. Gayan	
6	300 E. Second St., Suite 1510 Reno, Nevada 89501	Michael J. Gayan, Esq. Ian P. McGinn, Esq.	
7	Tel: 775-788-2228 <u>lhart@fclaw.com</u>	3800 Howard Hughes Pkwy, 17 th Flr. Las Vegas, NV 89169	
8	and	m.gayan@kempjones.com i.mcginn@kempjones.com	
9	IMPRESA LEGAL GROUP	Attomora for Plaintiff Mooga Pun IIC	
10 11	(<i>Pro Hac Vice</i> Petition to be submitted) George E. Kostel, Esq.	Attorneys for Plaintiff Moose Run, LLC	
12	3033 Wilson Blvd., Suite 700 Arlington, Virginia 22201		
13	Tel: 703-842-0660 georgekostel@impresalegal.com		
14	Attorneys for Defendant Renato Libric		
15	<u>ORDER</u>		
16			
17	1	T IS SO ORDERED.	
18	ī	UNITED STATES MAGISTRATE JUDGE	
19	ı	DATED: _May 18, 2018	
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